

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**GUSTAVO CARDENAS, JUSTINO NARANJO VARGAS,
SALVATORE NARANJO VARGAS, RUBIN NAVA,
Individually and on behalf of other persons similarly
Situated who were employed by AAA CARTING
And RUBBISH REMOVAL CORP., and/or
PASQUALE CARTALEMI and PASQUALE
CARTALEMI, JR., ANGELO CARTALEMI, or any
Other entities affiliated with or controlled by
AAA CARTING And RUBBISH REMOVAL CORP.
And PASQUALE CARTALEMI,**

Case No.: 12-CV-7178(VB)

**NOTICE OF MOTION FOR
PRELIMINARY APPROVAL
OF THE SETTLEMENT**

Plaintiffs,

-v-

**AAA CARTING and RUBBISH REMOVAL
CORP. and PASQUALE CARTALEMI and/or
PASQUALE CARTALEMI and PASQUALE
CARTALEMI, JR. and ANGELO CARTALEMI or any
Other entities affiliated with or controlled by
AAA CARTING And RUBBISH REMOVAL CORP.
And PASQUALE CARTALEMI, PASQUALE
CARTALEMI, JR., And ANGELO CARTALEMI,
and JOHN DOE BONDING COMPANIES 1-20,
and John and Jane Does,**

Defendants.

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Please take notice that, upon the annexed Declaration of Robert F. Milman, sworn to on April 17, 2015, and all exhibits attached thereto, and upon all prior pleadings and proceedings herein, the undersigned shall move before the Honorable Vincent L. Briccetti, at the United States Courthouse for the Southern District of New York, located at 300 Quarropas Street, White Plains, New York, 10601, on a date to be determined by the Court, for an Order granting Plaintiffs' Motion for Preliminary Approval of the Settlement of this Action reached by the parties and certifying this action as a class action pursuant to Rule 23 of the Federal Rules of Civil Procedure for settlement purposes only, along with such other and further relief as the Court deems proper.

Dated: April 20, 2015

Lake Success, New York

Respectfully submitted,

By: /s/

Robert F. Milman, Esq.

Netanel Newberger, Esq.

MILMAN LABUDA LAW GROUP PLLC

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